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7 Attorneys for A. Kyle Everett,
Trustee in Bankruptcy
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9 **UNITED STATES BANKRUPTCY COURT**
10 **NORTHERN DISTRICT OF CALIFORNIA**
11 **SAN FRANCISCO DIVISION**

12 In re BENJA INCORPORATED,
13 Debtor.
14

Case No. 20-30819-DM

Chapter 7

15 **STIPULATION FOR ENTRY OF**
16 **ORDER REGARDING BANKRUPTCY**
DISPUTE RESOLUTION PROGRAM
(JOMBOY)

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18 Kyle Everett, in his capacity as the Chapter 7 Trustee (“Trustee”) of the above-captioned
19 bankruptcy estate, and Jomboy Corporation (“Jomboy”, together with Trustee, the “Parties”), by
20 through their respective counsel, stipulate as follows:

21 1. The estate may have claims against the Jomboy, including but not limited
22 to claims related to transfers of certain interests in property of the Debtor to or for the
23 benefit of Jomboy.

24 2. In an effort to resolve their dispute consensually rather than through litigation, the
25 Parties have conferred and have agreed that the following individual is mutually acceptable for
26 appointment as Resolution Advocate in this matter: George Kalikman, Keller Benvenutti Kim
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1 LLP, 425 Market Street, 26th Floor, San Francisco, CA 94105; 415-420-1377;
2 gkalikman@kbklp.com.

3 3. The Parties have conferred with Mr. Kalikman, who has confirmed that he is able
4 and agreeable to serve as the mediator for the Parties' dispute.

5 4. The Parties are seeking to schedule a BDRP mediation with Mr. Kalikman on a
6 mutually acceptable date and are currently attempting to schedule the mediation in December
7 2023.

8 5. The Parties agree to comply with the rules governing the Northern District of
9 California Bankruptcy Dispute Resolution program, B.L.R. 9040-1 *et seq.*,
10 <https://www.canb.uscourts.gov/procedures/local-rules/bdrp>.

11 6. Counsel for the Trustee agrees to upload an order approving this Stipulation.
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13 Dated: November 30, 2023

FINESTONE HAYES LLP

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15 By: /s/ Kimberly S. Fineman

16 Kimberly S. Fineman

17 Attorneys for Kyle Everett, Trustee in Bankruptcy

18 Dated: November 30, 2023

GREENBERG GLUSKER FIELDS CLAMAN &
19 MACHTINGER LLP

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21 By: /s/ Keith Patrick Banner

22 Keith Patrick Banner

23 Attorneys for Jomboy Corp
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